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1 2 3 4	JASON M. FRIERSON United States Attorney Nevada Bar Number 7709 JUSTIN WASHBURNE Assistant United States Attorneys 501 Las Vegas Boulevard South, Suite 1100 Las Vegas, Nevada 89101	FILED RECEIVED SERVED ON COUNSEL/PARTIES OF RECORD  JUN 2 7 2023  CLERK US DISTRICT COURT DISTRICT OF NEVADA  BY: DEPUTY
5	Telephone: 702.388.6378 Justin.Washburne@usdoj.gov Attorneys for the United States	
6 7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
8	UNITED STATES OF AMERICA,	Case No. 2:23-mj-00548-DJA
9	Plaintiff,	Stipulation for an Order
10	v.	Directing Probation to Prepare a Criminal History Report
11 12	ALEXIS HUMBERTO LOPEZ- CACERES, aka "ALEXIS LOPEZ"	
13	aka "ALEXIS CACERES" aka "ALEXIS CACERES-LOPEZ,"	
14 15	Defendant.	
16	IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.  Frierson, United States Attorney, and Justin Washburne, Assistant United States Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and T. Kowat Lee , Assistant Federal Public Defender, counsel for defendant ALEXIS HUMBERTO LOPEZ-CACERES, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.  This stipulation is entered into for the following reasons:	
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- The United States Attorney's Office has developed an early disposition 1. 1 program for immigration cases, authorized by the Attorney General pursuant to the 2 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has 3 extended to the defendant a plea offer in which the parties would agree to jointly request an 4 5 expedited sentencing immediately after the defendant enters a guilty plea. The U.S. Probation Office cannot begin obtaining the defendant's criminal 2. 6 history until after the defendant enters his guilty plea unless the Court enters an order 7 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of 8 9 a defendant's initial appearance when charged by indictment. The U.S. Probation Office informs the government that it would like to begin 10 3. obtaining the criminal history of defendants eligible for the early disposition program as 11 soon as possible after their initial appearance so that the Probation Office can complete the 12 Presentence Investigation Report by the time of the expected expedited sentencing. 13
- Accordingly, the parties request that the Court enter an order directing the 14 4. U.S. Probation Office to prepare a report detailing the defendant's criminal history. 15 DATED this 27 day of June, 2023. 16

Respectfully Submitted,

RENE L. VALLADARES Federal Public Defender

JASON M. FRIERSON United States Attorney

20 21

/s/ Justin Washburne JUSTIN J. WASHBURNE Assistant United States Attorneys

Assistant Federal Public Defender Counsel for Defendant ALEXIS **HUMBERTO LOPEZ-CACERES,** 

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## 1 UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA** 2 UNITED STATES OF AMERICA, Case No. 2:23-mj-00548-DJA 3 Plaintiff, Order Directing Probation to 4 Prepare a Criminal History Report V. 5 ALEXIS HUMBERTO LOPEZ-6 CACERES, aka "ALEXIS LOPEZ" 7 aka "ALEXIS CACERES" aka "ALEXIS CACERES-LOPEZ," 8 Defendant. 9 10 Based on the stipulation of counsel, good cause appearing, and the best interest of 11 justice being served: 12 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a 13 report detailing the defendant's criminal history. 14 DATED this 29th day of June, 2023. 15 16 HONORABLE DANIEL ALBREGTS 17 UNITED STATES MAGISTRATE JUDGE 18 19 20 21 22 23 24